

# PRIVACY POLICY

## LT PRIDE 2026 CONFERENCE

5 June 2026

*Effective from: 21 April 2026*

This Privacy Policy explains what personal data we collect during registration for the LT Pride 2026 conference, how and why we collect it, on what legal grounds we process it, how long we retain it, and it informs you about your rights and how to exercise them, as well as provides other relevant and important information related to the processing of your personal data.

Personal data means any information relating to an identified or identifiable natural person (hereinafter – “Data”), such as your name, address or email address.

Given that the LT Pride 2026 conference is dedicated to the LGBTIQ+ community and its allies, we take particular care regarding the protection, confidentiality and security of participants’ personal data. Please take the time to review the information set out in this Privacy Policy carefully.

### 1. DATA CONTROLLER

The controller of your personal data is:

**National LGBT Rights Organisation “Lithuanian Gay League” (LGL Association)**

Legal entity code: 291902980

Address: Odminių st. 11-4, LT-01122, Vilnius, Lithuania

Tel.: +370 5 261 0314

Email: office@gay.lt

(hereinafter – the Controller).

#### **Contact point for data protection matters:**

Any questions and requests related to the processing of personal data may be sent by email to office@gay.lt, indicating “Data protection” in the subject line.

### 2. SPECIAL CATEGORIES OF PERSONAL DATA

#### **IMPORTANT NOTICE.**

Participation in the LT Pride 2026 conference, which is dedicated to the LGBTIQ+ community and its allies, may indirectly reveal information about your sexual orientation, gender identity or beliefs. Under Article 9(1) of the General Data Protection Regulation (hereinafter – GDPR), such data is considered a special category of personal data and is subject to enhanced protection.

The Controller processes such data only on the following legal bases:

- your explicit consent (GDPR Art. 9(2)(a)), obtained through the registration form separately from other consents;
- where the data has been manifestly made public by you (GDPR Art. 9(2)(e));
- as a not-for-profit body with a political, philosophical, religious or trade-union aim, where processing relates solely to members or persons who have regular contact with

the Controller, and the data are not disclosed outside the Controller without the data subject's consent (GDPR Art. 9(2)(d)).

You have the right to withdraw your consent at any time – this will not affect the lawfulness of processing carried out before withdrawal.

### 3. WHAT PERSONAL DATA WE COLLECT

#### 3.1. Data you provide directly when registering for the conference:

- first name, surname;
- contact telephone number;
- email address;
- if you register as a representative of an organisation or company – the organisation's / company's name and address;
- if you register another participant – that participant's first name and surname;
- preferences indicated during registration (e.g. for newsletters, for being photographed, for data sharing with sponsors).

#### 3.2. Data generated automatically:

- registration ID number;
- date and time of registration;
- when you visit the conference website, technical data may be collected (IP address, browser type, time of visit, pages viewed, geographic location) – see the Cookie Policy for details.

The LT Pride 2026 conference is a free-of-charge event, and therefore no payment data is collected.

### 4. PURPOSES OF PROCESSING, LEGAL BASES AND RETENTION PERIODS

We process your personal data for the following purposes:

Purpose	Legal basis	Retention period
Administration of conference registration and communication with participants	Consent (GDPR Art. 6(1)(a)) and legitimate interest in ensuring the organisation of the event (GDPR Art. 6(1)(f))	3 years from the end of the conference
Information revealing membership of the LGBTIQ+ community (special category data)	Explicit consent (GDPR Art. 9(2)(a))	Until withdrawal of consent or 3 years from the end of the conference
Sending newsletters about LT Pride and other LGL events	Consent (GDPR Art. 6(1)(a))	Until withdrawal of consent
Transfer of data to conference sponsors for reporting purposes	Consent (GDPR Art. 6(1)(a)) or legitimate interest in reporting to sponsors by providing aggregated data (GDPR Art. 6(1)(f))	Until the end of the sponsor's reporting period
Creation and publication of conference photographs and video recordings	Consent (GDPR Art. 6(1)(a)); where data may reveal sexual orientation – Art. 9(2)(a)	Until withdrawal of consent or as long as needed for publication (up to 5 years)

Purpose	Legal basis	Retention period
Accounting and financial reporting (where applicable – when sponsor funding is received)	Legal obligation (GDPR Art. 6(1)(c))	10 years in accordance with the General Document Retention Index of the Republic of Lithuania
Establishment and defence of legal claims	Legitimate interest (GDPR Art. 6(1)(f))	Until conclusion of legal proceedings + 1 year
Website functioning and statistics (cookies)	Legitimate interest (strictly necessary cookies) / consent (analytics and marketing cookies) (GDPR Art. 6(1)(f) and (a))	Up to 26 months (see Cookie Policy)

Upon expiry of the retention period, your personal data is securely destroyed.

## 5. DATA SHARING WITH CONFERENCE SPONSORS

The LT Pride 2026 conference is organised with the support of sponsors, funders and partners. For the purpose of reporting to sponsors (e.g. to confirm that the event took place and attracted the expected number of participants), the Controller may share certain participation-related data with sponsors.

### 5.1. Data shared:

- aggregated information on the number of participants and the distribution of represented sectors, where such statistics do not allow the identification of individual persons;
- in certain cases, where required by the sponsor's reporting rules or funding agreement – a list of participants containing the participant's first name, surname, represented organisation and/or email.

### 5.2. Your safeguards:

- the registration form provides information about the possible transfer of data to sponsors, identifying the specific sponsors or their categories;
- during registration, you have the option to consent or object to such data sharing separately; your objection will not affect your ability to participate in the conference in any way;
- written agreements are concluded with sponsors receiving identifiable data, obliging them to use the data only for reporting purposes, to ensure its confidentiality and security, and to delete the data upon the expiry of the reporting period;
- the Controller undertakes to minimise the amount of data shared with sponsors and, where possible, to provide only aggregated statistics instead of identifying data.

The legal basis for data sharing with sponsors is your separate consent (GDPR Art. 6(1)(a), and for special category data – Art. 9(2)(a)); where only aggregated (non-personal) data is shared – the Controller's legitimate interest in fulfilling its obligations to sponsors (GDPR Art. 6(1)(f)).

## 6. HEIGHTENED CONFIDENTIALITY

The Controller understands that participation in an LGBTIQ+ community event is a sensitive personal matter, and that disclosure of data could lead to discrimination or other adverse consequences for the participant.

For this reason, the Controller will NEVER publicly disclose, transfer or reveal to third parties any conference participant lists or other information that could reveal your participation in the event, except where required by legal obligations or where you have given explicit consent to such disclosure.

Photographs and video recordings made during the conference may be used for communication purposes only with participants' consent, or in a manner ensuring that individual participants cannot be identified. During registration and at the event venue, you will be able to indicate your preferences regarding photography and filming (e.g. by receiving a designated badge indicating that you do not wish to be photographed).

## **7. NEWSLETTERS**

If you have given separate consent through the conference website to receive information about LT Pride 2026 or other events organised by the Controller, the Controller processes the following personal data: first name, email address.

The data for sending newsletters is obtained during registration or through a separate newsletter subscription form. The legal basis for processing is your consent (GDPR Art. 6(1)(a)).

The Controller, as a not-for-profit organisation, does not engage in commercial direct marketing within the meaning of Article 2(13) of the Lithuanian Law on Legal Protection of Personal Data. Informational messages about other free-of-charge events organised by the Controller or its ongoing human rights initiatives are sent only to those individuals who have given separate and explicit consent to receive them.

You have the right to withdraw your consent at any time by clicking the link at the bottom of each email received, or by contacting us at [office@gay.lt](mailto:office@gay.lt).

## **8. PROTECTION OF MINORS' DATA**

The LT Pride 2026 conference is primarily intended for adults. Minors aged 14 and above may register and attend the conference independently; however, given the nature of the conference, the Controller recommends that minors discuss participation with their parents or legal guardians in advance.

Personal data of minors under the age of 14 is processed only with the consent of a parent or legal guardian. If we learn that we have inadvertently collected data of a minor under 14 without such consent, we will delete it without undue delay.

Enhanced protection applies to minors' data: it is not shared with sponsors in an identifiable form (only as aggregated statistics) and is not used for marketing purposes.

## **9. DATA SECURITY**

We implement all technical and organisational security measures necessary to protect your Data from unauthorised loss, access, modification, disclosure or destruction, including:

- SSL / TLS encryption for data transmission;
- access controls (passwords, two-factor authentication in selected systems);
- restricting access to data to those employees and volunteers for whom such access is necessary to perform their duties;
- confidentiality undertakings by employees and volunteers;
- regular data backups;
- incident management procedures and a personal data breach notification process.

Given the particular sensitivity of the data of members of the LGBTIQ+ community, we apply additional protection measures and regularly review the effectiveness of security measures.

## **10. AUTOMATED DECISION-MAKING AND PROFILING**

The Controller does not carry out automated decision-making or profiling that would produce legal effects concerning you or similarly significantly affect you within the meaning of Article 22 of the GDPR.

## **11. PROTECTION OF LEGITIMATE INTERESTS**

On the basis of its legitimate interest in defending its rights, including in civil disputes, the Controller processes the names and surnames of persons involved in the case, the circumstances of the case, other case-related information and publicly available information. Such data may be transferred to law-enforcement authorities, attorneys or bailiffs enforcing recovery. The data is destroyed 1 year after the final resolution of the case and full satisfaction of the Controller's claims (where applicable).

On the same legal basis, the Controller also processes the personal data contained in consents for the processing of personal data, as well as the personal data contained in documents intended to implement data subjects' rights or by which we refuse to implement them. Such data is destroyed 3 years after the end of the calendar year in which the processing ended and/or the data subject's rights were implemented (or refused).

## **12. RECIPIENTS OF YOUR PERSONAL DATA**

### **12.1. Data processors (acting on behalf of the Controller):**

- IT and cloud service providers (server hosting, data storage);
- operators of registration systems (e.g. online registration platforms);
- operators of email delivery platforms;
- accounting service providers (where applicable).

We require all data processors to ensure an appropriate level of protection for your data, and we ensure that your personal data is processed only as instructed by us and only for the stated purposes. Written contracts are concluded with all data processors in accordance with Article 28 of the GDPR.

### **12.2. Other data controllers to whom data may be transferred:**

- conference sponsors and partners (as described in Section 5);
- law-enforcement authorities, courts, the State Data Protection Inspectorate – where required by law;
- social media operators (Meta, LinkedIn, Google) – where you visit our pages or corresponding cookies/pixels are used.

If you have any questions about our service providers or conference sponsors, please contact us at [office@gay.it](mailto:office@gay.it).

## **13. INTERNATIONAL DATA TRANSFERS**

Some of our service providers are established outside the European Economic Area (EEA) (e.g. in the USA). In such cases, we ensure an adequate level of data protection by using the Standard Contractual Clauses adopted by the European Commission, or by relying on Commission adequacy decisions (e.g. the EU-US Data Privacy Framework).

The parent entities of the social media (Facebook, Instagram, LinkedIn, X, YouTube) and search (Google) service providers are established in the United States. Data of EU residents is processed by the European entities of these companies:

- Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) – Facebook and Instagram; privacy policy: <https://www.facebook.com/privacy/explanation/>;
- LinkedIn Ireland Unlimited Company (Wilton Plaza, Wilton Place, Dublin 2, Ireland) – LinkedIn; privacy policy: <https://www.linkedin.com/legal/privacy-policy>;
- Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) – Google and YouTube; privacy policy: <https://policies.google.com/privacy>.

If you have complaints about the actions of these data controllers, you have the right to lodge a complaint with the lead supervisory authority – the Irish Data Protection Commission – or with the Lithuanian State Data Protection Inspectorate.

## **14. TRANSFER OF DATA IN THE EVENT OF A CHANGE OF CONTROLLER**

In the event of the Controller’s reorganisation or transfer of activities, your personal data processed by us may be transferred to the organisation succeeding the activities, which will become your new data controller. The legal basis for such transfer is the Controller’s legitimate interest in ensuring the continuity of its activities (GDPR Art. 6(1)(f)).

In the event of a change of data controller, you will be informed separately. Following any such change, your personal data will be processed only for the purposes for which it was originally collected from you.

## **15. HOW WE PROCESS YOUR PERSONAL DATA**

We ensure that your personal data is used in accordance with applicable law, observing the principles set out in Article 5 of the GDPR:

- lawfulness, fairness and transparency;
- purpose limitation (data collected only for specified, legitimate purposes);
- data minimisation (only data necessary for the purposes is processed);
- accuracy (data is accurate and kept up to date);
- storage limitation;
- integrity and confidentiality (adequate level of security);
- accountability.

## **16. YOUR RIGHTS**

Under the GDPR, you, as a data subject, have the following rights:

- right to receive information about processing (GDPR Art. 13–14);
- right of access to the data being processed (GDPR Art. 15);
- right to rectification of inaccurate or incomplete data (GDPR Art. 16);
- right to erasure – the “right to be forgotten” (GDPR Art. 17);
- right to restriction of processing (GDPR Art. 18);
- right to data portability (GDPR Art. 20);
- right to object to processing (GDPR Art. 21);
- right to withdraw consent at any time, without affecting processing carried out before withdrawal (GDPR Art. 7(3));
- right not to be subject to automated decision-making (GDPR Art. 22);
- right to lodge a complaint with the State Data Protection Inspectorate.

*Note: the right to erasure or to restrict processing may be exercised only where at least one of the conditions set out in Articles 17 or 18 of the GDPR applies.*

## **17. EXERCISING DATA SUBJECT RIGHTS**

To exercise your rights, you may submit a request in person, by post, or by email to [office@gay.lt](mailto:office@gay.lt).

The request must be legible and signed (including by qualified electronic signature); it must contain the data subject's first name, surname, address and/or other contact details. Where there is any doubt regarding the data subject's identity, we may request additional information to verify it.

You may exercise your rights personally or through a representative. The representative must provide their own contact details, the name and surname of the person being represented, and a document (or copy) confirming the representation.

We will respond no later than within one month of receiving the request. This period may be extended by a further two months where necessary, taking into account the complexity and number of requests, and you will be notified of any such extension.

## **18. SUPERVISORY AUTHORITY**

If you consider that your personal data is being processed in violation of applicable law, you have the right to lodge a complaint with the supervisory authority:

### **State Data Protection Inspectorate (Valstybinė duomenų apsaugos inspekcija)**

Address: L. Sapiegos st. 17, LT-10312 Vilnius, Lithuania

Tel.: +370 5 271 2804, +370 5 279 1445

Email: [ada@ada.lt](mailto:ada@ada.lt)

Website: <https://vdai.lrv.lt>

Before contacting the supervisory authority, we kindly ask you to first contact us at [office@gay.lt](mailto:office@gay.lt) – we will do our best to resolve the matter promptly and in good faith.

## **19. CHANGES TO THIS PRIVACY POLICY**

As we continuously develop and improve the Controller's activities, this Privacy Policy may be updated from time to time. Updates will be published on the conference website and will take effect from the date of publication. If the changes significantly affect your rights and freedoms, we will endeavour to notify you personally (e.g. by email).

We recommend reviewing this Privacy Policy periodically.

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